

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MAUREEN O'DONNELL and RICHARD
DANIEL McWRIGHT, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

TIMESHARE RELIEF, INC.; ISOSCELES
FOUNDATION; TRANSFER AMERICA,
LLC; ASTON MARKETING
GROUP, INC.; DAVID MACMILLAN;
and CINDY MACMILLAN,

Defendants.

Case No. 13-12665

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Massachusetts Local Rule 83.5.3(b), John Roddy, a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves for the admission of Beth E. Terrell, member of the Bars of the States of California and Washington, to this Court. Ms. Terrell seeks to appear and practice in this Court as co-counsel for Plaintiffs, Richard Daniel McWright and Maureen O'Donnell.

In support of this motion, I have attached a sworn certification by Ms. Terrell that: (1) she is in good standing with the bars of the courts to which she is admitted; (2) no disciplinary proceedings are pending against her as a member of the bar in any jurisdiction; and (3) she will abide by the rules of this Court.

WHEREFORE, it is respectfully requested that Beth E. Terrell be admitted to practice before this Court *pro hac vice* for the purpose of representing the Plaintiffs in this Court in this matter.

Date: October 22, 2013

Respectfully submitted

/s/ John Roddy
John Roddy, BBO #424240
Bailey & Glasser LLP
125 Summer Street, Suite 1030
Boston, MA 02110
Telephone: (617) 439-6730
Fax: (617) 951-3954
jroddy@baileyglasser.com

Rule 7.1 Certificate

I hereby certify that counsel for Plaintiffs could not confer with counsel for Defendants as counsel for Defendants has not yet entered a notice of appearance.

/s/ John Roddy
John Roddy

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) and paper copies will be sent to those indicated as non-registered participants on October 22, 2013.

/s/ John Roddy
John Roddy